

# Michael Faillace & Associates, P.C.

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April 6, 2018

**BY ECF**

Honorable Debra Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Segura, et al. v. Inkay Corp., et al.,  
16-cv-4099 (LTS)(DF)

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. Plaintiffs write jointly with Defendants to provide the Court with this status report. Since the telephonic settlement conference before Your Honor on March 20, 2018, the parties have exchanged two settlement demands and offers, however the parties are still very far apart. The parties believe, however, that we could potentially make significant progress at the settlement conference scheduled before Your Honor on April 12, 2018 at 2:00 p.m. The parties intend to timely submit pre-settlement conference submissions to Your Honor.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

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/s/  
Shawn Clark  
Michael Faillace & Associates, P.C.  
*Attorneys for Plaintiffs*

cc: (By ECF)  
Martin E. Restituyo  
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*Attorneys for Defendants*